

Small Scale Privacy Impact Assessment Template

Home Working Policy

This checklist aims to help departments proposing change to establish whether the personal information aspects comply with the Principles in Schedule 1 of the Data Protection Act (DPA) prior to full deployment or amendment to a project, procedure, policy or process involving the processing of personal data.

All employees are encouraged to seek guidance from the Information Governance Department on extension 2119 and 2816.

METHODOLOGY OF ASSESSMENT
<i>Preparation:</i>
Provide a summary of how you are going to assess this privacy impact.
<p>Consider whether the reviewed policy will directly or indirectly affect the privacy of any individuals</p> <p>Review of current process and what happens at the moment</p> <p>Review how documents are sent and received by the Trust</p> <p>DPA impact</p> <p>Impact on any other Information Governance Policies</p>
PRIVACY IMPACT ASSESSMENT
<i>Consultation with Stakeholder:</i>
This should document the Privacy Impact in detail and reference concerns raised by the stakeholders in the Project Summary.
<ol style="list-style-type: none"> 1. The home working policy allows employees to work from home either on an occasional basis or as a more permanent arrangement 2. Employees who work from home are required to have a designated work space to use as a working from home computer or will be laptop users 3. Home working can only be carried out by specific roles as there are clearly some roles (i.e. patient facing roles) that would be unable to be carried out at home 4. Home working raises various issues around safety, confidentiality, security and time management which Managers are expected to raise and monitor with any employees who work from home for the duration of the time they work from home
<i>Risk Analysis of Identified Privacy Impact:</i>
Provide a Risk Assessment of the Identified Privacy Impact.
<ol style="list-style-type: none"> 1. When an employee works from home, this means that there is a higher risk that information specific to Salisbury NHS Foundation Trust could be viewed by family members 2. Where a computer at the home is used to work on, anything saved to that specific computer could be viewed by another person within the home that uses that PC. Also using a home computer poses a risk in terms of home internet access when using a .net email access. 3. As there are only certain roles where home working could be considered as an option, this means that other roles would not be eligible for home working arrangements 4. Managers would be expected to Manage employees in terms of managing their time whilst working from home and also ensure that they receive the correct training in terms of safety, confidentiality and security to ensure that policies around these are adhered to at all times

Proposed Solution:
Description of the measures proposed to counter (or justify) the Privacy Impact.
<p>1. Employees who work from home sign an application form at appendix A within the policy to confirm that they will ensure that no Trust specific information could be viewed by friends or family members within the home when home working is taking place</p> <p>2. Similarly this agreement confirms that the employee would take appropriate steps to ensure that any files on the computer are security protected to ensure that they would only be viewed by the employee themselves. Employees using a home computer and using .net email address will also be required to ensure that this is used appropriately at all times.</p> <p>3. Roles which are mainly patient facing or require attendance in the Trust (e.g. nursing roles and reception staff) would not normally be eligible for home working. An exception to this would be where a specific project may need to be completed and an ad hoc home working situation may then be appropriate.</p> <p>4. The policy provides a Manager's guidance and a checklist to ensure that Managers have considered all avenues when agreeing to such a request and to also ensure that the employee is aware of their obligations whilst working from home.</p>
REVIEW AND AUDIT PHASE
Implementation:
Provide details that demonstrate that the Proposed Solution was actually implemented, or refer to evidence that approved the privacy impact risk.
<p>The Policy will be reviewed in line with the review date. A new Privacy Impact Assessment will also be completed at this time.</p> <p>Any concerns regarding privacy that come to light before this time will be dealt with accordingly.</p>

PIA Completed by:

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Reviewed by:

Name:		Date Received:	
Job Title:			
Directorate:		Date Approved	
Department:		Date Declined	
Email:			
Comments/Concerns			
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